

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                                          |   |                        |
|------------------------------------------|---|------------------------|
| In re:                                   | ) | Chapter 11             |
|                                          | ) |                        |
| FIELDWOOD ENERGY LLC., <i>et al.</i> ,   | ) | Case No. 20-33948 (MI) |
|                                          | ) |                        |
| Post-Effective Date Debtors <sup>1</sup> | ) | (Jointly Administered) |
|                                          | ) |                        |
|                                          | ) |                        |
|                                          | ) |                        |

**RESPONSE OF NORTH AMERICAN SPECIALTY INSURANCE COMPANY n/k/a  
SWISS RE CORPORATE SOLUTIONS INSURANCE CORPORATION TO PLAN  
ADMINISTRATOR'S FIFTEENTH OMNIBUS OBJECTION TO CLAIMS**

North American Specialty Insurance Company n/k/a Swiss Re Corporate Solutions Insurance Corporation ("Swiss Re") sets forth the following as its Response to *Plan Administrator's Fifteenth Omnibus Objection to Claims Pursuant Section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims* (Dkt. # 2556):

1. To the extent that the relief sought is merely to provide the Swiss Re original claims were amended to reflect a lower amount for these claims, \$39,000,000.00, reducing the original claims by \$4,265,000.00, which is the amount of the reduction rider for Bond No. 2196705, naming Eni Petroleum US LLC and Eni US Operating Co. Inc. as obligee, Swiss Re has no objection to the proposed order as the claims of record will be in the amount of the

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<sup>1</sup> The Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

amendments filed by Swiss Re. Swiss Re notes this relief could have been requested by stipulation as opposed to an objection.

2. Swiss Re also gives notice that it will be amending its unsecured claims and its administrative claim to include the payment made on April 27, 2022, by Swiss Re to Eni US Operating Co. Inc. of \$19,950,000.00, the full amount of Bond No. 2196705, and to the extent of that payment such claims are no longer contingent. These claims will also be amended to reflect the new name of the corporate entity, Swiss Re Corporate Solutions Insurance Corporation.

WHEREFORE, Swiss Re has no objection to the proposed order stating that its original claims are superseded by the claims in the amount of \$39,000,000.00, provided the order has no effect on further amendment of the claims.

Date: August 15, 2022

Respectfully submitted,

/s/ T. Scott Leo

T. Scott Leo

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of August 2022 a true and correct copy of the foregoing Response to 15<sup>th</sup> Omnibus Claims Objection was served via the Court's electronic case filing system (CM/ECF) to all parties registered to receive such notice in the above-captioned case.

/s/ T. Scott Leo